

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

COTTON STATES MUTUAL  
INSURANCE COMPANY,

EBRA P. HACH )  
U.S. DISTRICT )  
MIDDLE DIST )

Plaintiff,

V.

) CASE NO. 07-CV-868-WKW

LEE A. SELLARS and )  
JASON ANDREW DONALD )

Defendants.

**ANSWER**

Comes now Defendant, Jason Andrew Donald, and files this his Answer to Complaint for Declaratory Judgment filed by Plaintiff and states as follows:

1. No response to Paragraph Number 1 is required of this Defendant.
2. No response to Paragraph Number 2 is required of this Defendant.
3. Admitted.
4. Admitted.
5. No response to Paragraph Number 5 is required of this Defendant.
6. No response to Paragraph Number 6 is required of this Defendant.
7. No response to Paragraph Number 7 is required of this Defendant.
8. No response to Paragraph Number 8 is required of this Defendant.

9. No response to Paragraph Number 9 is required of this Defendant.
10. No response to Paragraph Number 10 is required of this Defendant.
11. Defendant admits that on April 3, 2007, the Honda Accord identified herein was at his residence located at 9655 Wilson Road in Elberta, Baldwin County, Alabama. Furthermore, Defendant admits that Defendant Lee Sellars' daughter, Lindley Sellars, was living with him at this address on the date in question. In addition, on April 3, 2007, Defendant admits that he used the Honda Accord identified herein. Defendant would state that on that date in question he had been using said automobile on a regular basis with the permission of Lindley Sellars. Furthermore, the Defendant would assert that Lee Sellars, Lindley Sellars' father and the owner of said vehicle, was also aware of his use of said automobile. Defendant denies the remaining allegations of this paragraph and demands strict proof thereof.
12. Defendant admits that he used the Honda Accord identified herein on the date in question, and that he had a history of using said automobile prior to this date with no objections from either Lindley Sellars or Defendant Lee Sellars. Defendant denies the remaining allegations of this paragraph and demands strict proof thereof.

13. Admitted.
14. Defendant admits that he was involved in an accident on County Road 20 located in Baldwin County, Alabama wherein the vehicle that he was operating collided with the vehicle operated by Rosemary Rowell Stanley. Defendant denies the remaining allegations contained in Paragraph 14 and demands proof thereof.
15. No response to Paragraph Number 15 is required of this Defendant.
16. Defendant denies that any charges have been filed against him following said accident as a result of any blood alcohol test that was performed following the accident in question. Furthermore, the Defendant would state that the accident report in question speaks for itself.
17. No response to Paragraph Number 17 is required of this Defendant.
18. No response to Paragraph Number 18 is required of this Defendant.
19. No response to Paragraph Number 19 is required of this Defendant.
20. No response to Paragraph Number 20 is required of this Defendant.
21. No response to Paragraph Number 21 is required of this Defendant.
22. No response to Paragraph Number 22 is required of this

Defendant.

23. No response to Paragraph Number 23 is required of this Defendant.

24. No response to Paragraph Number 24 is required of this Defendant.

25. No response to Paragraph Number 25 is required of this Defendant.

26. No response to Paragraph Number 26 is required of this Defendant.

27. No response to Paragraph Number 27 is required of this Defendant.

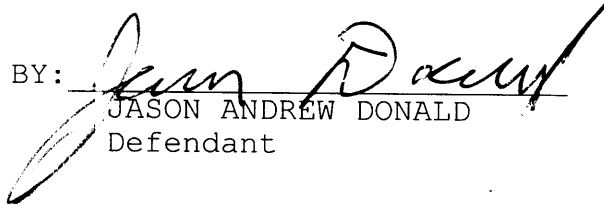
28. No response to Paragraph Number 28 is required of this Defendant.

29. No response to Paragraph Number 29 is required of this Defendant.

Wherefore, the premises considered, Defendant would respectfully request that the Court deny Plaintiff Cotton States Mutual Insurance Company's request for Declaratory Judgment seeking a declaration that there is no coverage to Defendants Sellars or Donald under the aforementioned insurance policy in connection with the Stanley claim and furthermore denying Cotton States Mutual Insurance Company's claim that they have no obligation to defend Defendants Sellars and Donald in connection with said Stanley claim.

Respectfully submitted,

BY:

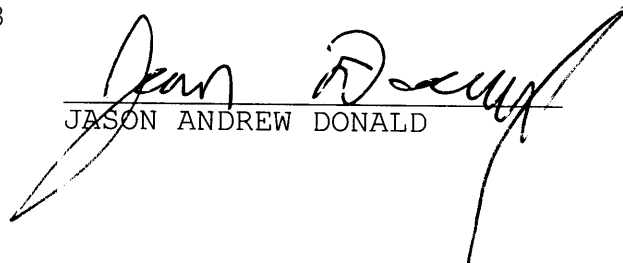
  
JASON ANDREW DONALD  
Defendant

CERTIFICATE OF SERVICE

I, JASON ANDREW DONALD hereby certify that I have on this date, served a copy of the foregoing upon all parties in the above styled case and cause, by placing a copy of the same in the U.S. Mail and/or by efileing the same using Alafile on this the 15th day of October, 2007.

Lee A. Sellars  
6213 Olive Drive  
Montgomery, Alabama 36117

Jannea S. Rogers  
Adams and Reese, LLP  
Post Office Box 1348  
Mobile, Alabama 36633

  
JASON ANDREW DONALD